

2. In furtherance of the conspiracy and to effect its objects, in the Northern District of Texas and elsewhere, the Defendant,

THE BOEING COMPANY,


together with others, knowingly committed and caused the commission of the following overt acts, among others:


- a. On or about January 17, 2017, an employee of THE BOEING COMPANY emailed an employee of the FAA AEG about the 737 MAX FSB Report, stating in part, “Flight Controls: Delete MCAS, recall we decided we weren’t going to cover it [. . .] since it’s way outside the normal operating envelope.”
- b. On or about July 7, 2017, an employee of THE BOEING COMPANY emailed employees of at least two major U.S.-based airline customers, stating in part, “Attached is the final and approved 737 FSB [R]eport which adds the 737 MAX.”

(In violation of Title 18, United States Code, Section 371).

DANIEL S. KAHN
Acting Chief, Fraud Section
Criminal Division
United States Department of Justice

ERIN NEALY COX
United States Attorney
Northern District of Texas

By: 
Cory E. Jacobs, Trial Attorney
New York Bar No. 4761953
cory.jacobs@usdoj.gov

By: 
Chad E. Meacham, Assistant U.S. Attorney
Texas Bar No. 00784584
CMeacham@usa.doj.gov

Michael T. O’Neill, Assistant Chief
New York Bar No. 4689782
michael.t.oneill@usdoj.gov

United States Attorney’s Office
Northern District of Texas
1100 Commerce Street, 3rd Floor
Dallas, TX 75242
214-659-8600

Scott Armstrong, Trial Attorney
D.C. Bar No. 993851
scott.armstrong@usdoj.gov

United States Department of Justice
Criminal Division, Fraud Section
1400 New York Avenue, N.W.
Washington, D.C. 20005
202-514-2000